

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**BRANDY KOSUB,**

**PLAINTIFF,**

**vs.**

**ROBERT TAIYO GUERRA AND  
ACADIAN AMBULANCE SERVICE, INC.,**

**DEFENDANT.**

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**CIVIL ACT. NO. 5:23-cv-00049-FB**

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**PLAINTIFF'S REQUEST FOR HEARING ON PLAINTIFF'S CORRECTED  
MOTION TO REMAND AND MOTION FOR LEAVE TO AMEND PLEADING**

**TO THE HONORABLE UNITED STATES DISTRICT COURT:**

NOW COMES Plaintiff Brandy Kosub, Movant herein, pursuant to 28 U.S.C. § 1447(c), and files this Request for Hearing on Plaintiff's First Corrected Motion to Remand and Motion for Leave to Amend Pleading in this action previously removed from the 81<sup>st</sup> Judicial District Court, Wilson County, Texas, and states as follows:

This is a standard car wreck case. Defendants improperly removed the case to this Court to cause delay and avoid a pending Motion to compel hearing. Plaintiff filed a Motion to Remand on or about January 30, 2023, and a Reply on February 20, 2023. Plaintiff requests that this case be remanded back to state Court as soon as possible, and would request a hearing, if necessary, to help facilitate the remand.

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**ATTORNEY FOR PLAINTIFF  
BRANDY KOSUB**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record and parties via the Court's ECF system, this 19<sup>th</sup> day of July, 2023.

  
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**G. Eric De Leon**